

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA

VS.

CHRISTOPHER REINHARD BROWN

§
§
§
§
§

CRIMINAL NO: 4:24-CR-00126-P

**DEFENDANT’S UNOPPOSED FIRST MOTION FOR CONTINUANCE
OF TRIAL AND ALL PRE-TRIAL DEADLINES**

TO THE HONORABLE JUDGE MARK T. PITTMAN:

Defendant, **CHRISTOPHER REINHARD BROWN**, by and through his attorney of record, **BRETT D. BOONE**, moves for continuance of trial and all pre-trial deadlines in the above styled and numbered cause and in support thereof would show the following:

I.

By Order of the Court jury trial is set for July 1, 2024. Counsel for Defendant requests that the trial and all pretrial deadlines currently set be reset to a later date.

II.

Counsel for Defendant requests this continuance for the reason that he has pre-paid travel out of state from Saturday, June 29, 2024 through Friday, July 5, 2024.

III.

Defense counsel certifies that the reasons for the request do not include a lack of diligent preparation or unwarranted delay on the part of the parties involved.

IV.

Counsel for Defendant is unavailable on the following dates during the next 90 days, to-wit:

1. June 29, 2024 through July 5, 2024 - prepaid travel;
2. August 19, 2024 - Capital Murder Trial - State v. Armstrong, Criminal District Court No. 2, Tarrant County, Texas;
3. August 21, 2024 - Aggravated Assault on Peace Officer trial - State v. Rosas, Criminal District Court No. 3, Tarrant County, Texas; and
4. September 9, 2024 through September 13, 2024 - Hospital fund drive for Shriners Hospital for Children (Attorney Boone is the organizer).

Defense counsel did confer with Brandie Wade, Assistant United States Attorney, who is unopposed to this motion and who is unavailable on the following dates during the next 90 days, to-wit:

1. July 3, 2024 through July 9, 2024 - prepaid travel;
2. Agent out of state July 23, 2024 through August 6, 2024;
3. July 29, 2024 - Trial - U.S.A. v. Vincent Boyden, Judge Godbey - Dallas
4. August 12, 2024 through August 15, 2024 - Crimes Against Children Conference, Dallas;
5. August 26, 2024 - Trial - U.S.A. v. Raymond Smith, Judge Starr - Dallas; and
6. September 3, 2024 - Trial - U.S.A. v. Kevin Gear, Judge Lindsay - Dallas

WHEREFORE, PREMISES CONSIDERED, Defendant prays this Court grant a continuance of the trial and all pretrial deadlines to a later date.

Respectfully submitted,

/s/ Brett D. Boone

BRETT D. BOONE

6205 Airport Freeway

Fort Worth, Texas 76117

(817) 831-0100

(817) 831-0537 Facsimile

Email: bboone@flash.net

State Bar No: 02626800

ATTORNEY FOR DEFENDANT

CERTIFICATE OF CONFERENCE

On May 30, 2024, the undersigned counsel conferred with Brandie Wade, Assistant United States Attorney, who indicated she is unopposed to this Motion.

/s/ Brett D. Boone

BRETT D. BOONE

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2024, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means: Ms. Brandie Wade, Assistant United States Attorney.

/s/ Brett D. Boone

BRETT D. BOONE